

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**DELAWARE DISPLAY GROUP LLC
and INNOVATIVE DISPLAY
TECHNOLOGIES LLC,**

Plaintiffs,

V.

**LENOVO HOLDING CO., INC., and
LENOVO (UNITED STATES) INC.,**

Defendants.

C.A. No. 13-cv-2108-RGA

JURY TRIAL DEMANDED

**DELAWARE DISPLAY GROUP LLC
and INNOVATIVE DISPLAY
TECHNOLOGIES LLC,**

Plaintiffs,

V.

**LG ELECTRONICS, INC.,
LG ELECTRONICS U.S.A., INC.,
LG DISPLAY CO., LTD., and
LG DISPLAY AMERICA, INC.,**

Defendants.

C.A. No. 13-cv-2109-RGA

JURY TRIAL DEMANDED

**DELAWARE DISPLAY GROUP LLC
AND INNOVATIVE DISPLAY
TECHNOLOGIES LLC**

Plaintiffs,

V.

VIZIO, INC.,

Defendant.

C.A. No. 13-cv-2112-RGA

JURY TRIAL DEMANDED

**PLAINTIFFS' MOTION TO EXCLUDE
TESTIMONY RELATING TO THE EXPERT REPORTS OF MICHAEL J. ESCUTI**

Plaintiffs Delaware Display Group LLC and Innovative Display Technologies LL, by and through their undersigned counsel, hereby move to exclude testimony relating to the expert reports of Michael J. Escuti. The grounds for the motion are set forth in Plaintiffs' opening brief filed contemporaneously with this motion. Pursuant to Local Rule 7.1.1, counsel for Plaintiffs conferred with counsel for Defendants regarding this motion. Defendants oppose this motion.

DATED: August 26, 2016

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (#4089)

Michael J. Farnan (#5165)

919 North Market Street

12th Floor

Wilmington, DE 19801

(302) 777-0300

bfarnan@farnanlaw.com

mfarnan@farnanlaw.com

Jeffrey R. Bragalone (admitted *pro hac vice*)

Patrick J. Conroy (admitted *pro hac vice*)

Justin B. Kimble (admitted *pro hac vice*)

Daniel F. Olejko (admitted *pro hac vice*)

T. William Kennedy, Jr. (admitted *pro hac vice*)

Stephanie Wood (admitted *pro hac vice*)

James R. Perkins (admitted *pro hac vice*)

BRAGALONE CONROY P.C.

Chase Tower,
2200 Ross Ave., Suite 4500W
Dallas, Texas 75201
214-785-6670 Telephone
214-785-6680 Facsimile
jbragalone@bcpc-law.com
pconroy@bcpc-law.com
jkimble@bcpc-law.com
dolejko@bcpc-law.com
bkennedy@bcpc-law.com
swood@bcpc-law.com
jperkins@bcpc-law.com

Attorneys for Plaintiffs

**DELAWARE DISPLAY GROUP LLC and
INNOVATIVE DISPLAY
TECHNOLOGIES LLC**